

PART 4

PRODUCT STORAGE AND EMERGENCY PLANNING REQUIREMENTS

Chemical Storage

You must meet certain requirements if you have any of the chemicals listed in the Department of Environmental Quality's (DEQ's) Water Bureau Part 5 rules of Part 31 of Act 451 (e.g., solvents, ethylene glycol used in antifreeze, sulfuric acid in lead acid batteries, etc.). These requirements kick in if you store these chemicals outside in an amount equal to or greater than 220 pounds or inside a building in amounts equal to or greater than 2,200 pounds. The Water Bureau requirements include preparing a Pollution Prevention Incident Plan (PIPP) along with surveillance, storage requirements, secondary containment, release reporting, and notifications to local agencies and the DEQ when a company falls under these chemical storage criteria. A PIPP documents information such as what chemicals are on site and how the company will respond to releases of these chemicals. Go to the Web at www.michigan.gov/deqwater and select "Emergency Response to Releases to Water" from the left drop-down menu for a checklist of what is in a PIPP, a list of regulated chemicals, and other information along with a list of Water Bureau staff contacts.



Handling Oil Products Including Vehicle And Heating Fuel Storage

There are several agencies that oversee the environmental regulations pertaining to the storage of oil products and heating fuel storage. A federal Spill Pollution Control and Countermeasure (SPCC) Plan that addresses storage requirements including secondary containment and emergency response measures, is required when a company's site has 1,320 gallons or more of storage capacity for all oil products and wastes. The definition of oil products includes lubricating oils, motor oils, hydraulic oils, diesel fuel, and gasoline.

There are currently a set of proposed rules at the federal level which may change some of the SPCC requirements. The rules have not been finalized. If you would like more information on the proposed changes to the SPCC, go to the U.S. Environmental Protection Agency's (USEPA's) Web site at www.epa.gov/oilspill or contact a USEPA Region 5 staff person at 312-886-0185. When a facility is subject to the federal SPCC regulations, they should include the additional release reporting requirements for the state water program under the Part 5 rules. For more information on this integration, see the Water Bureau's *Part 5 Rules Operational Guidance (POG)* #2 for "oil" and the *PIPP Part 5 Rules Information Packet* summary on the DEQ Web site at www.michigan.gov/deqwater and then select "Emergency Response to Releases to Water" from the left drop-down menu. To locate the operational guidance and the information packet summary from here, select "Part 5 Rules Guidance Documents" under "Information" in the middle of the page. The operational guidance is located at the top of the page; and the information packet summary is found under "Part 5 Rules Information Package: Summary of Changes, Facilities Subject to the Rules, FAQs, and the Part 5 Rules."

Storage Tanks

Many crushers utilize aboveground storage tanks (ASTs), liquefied petroleum gas (LPG) tanks, LPG containers, and other storage containers in their day-to-day operations. The storage and handling of products such as gasoline, diesel fuel, fuel oils, and other liquid chemicals can have environmental and safety consequences if the tanks are not properly installed and maintained. Also, the product transfer operations must be properly managed to minimize the possibility of spillage, releases, and possible fire hazards. Storage tank regulations were designed to promote the safe storage and handling of flammable and combustible liquids such as petroleum products and other hazardous substances. The following requirements are designed to promote safer storage and handling practices at a company and result in overall economic benefits to crushing operations and consumers.

An Overview of the WHMD's Storage Tank Program

The DEQ's Waste and Hazardous Materials Division (WHMD) Storage Tank Unit (STU) oversees the storage and use of the flammable and combustible liquids (FL/CL) and regulates ASTs. It also oversees the regulations for LPG systems in Michigan. Proper certifications for these tank units must be in place prior to conducting a fueling or storage activity. Companies that *supply* flammable or combustible liquids with flash points less than 200 degrees Fahrenheit *and* that have an individual tank storage capacity of more than 1,100 gallons must obtain a permit from the WHMD, STU.

The tank systems, storage tanks, portable tanks, generator tanks, or containers must have their engineering and layout plan reviewed and certified and the tanks inspected. In order for the permit to be granted, a fee must also be paid. Additionally, any FL/CL AST system greater than 660 gallons and containers 60 gallons or more in capacity must meet secondary containment requirements. More information on this requirement is available on the Web at www.michigan.gov/deqland. Select "Storage Tanks" from the left drop-down menu. Questions regarding this permitting program can be directed to staff in the DEQ's STU at 517-335-7211.

Basic Requirements for FL/CL Aboveground Storage Tank Systems

- Have spill containment of 110 percent for the largest container at the company (which is the volume of the container plus 10 percent in case of precipitation).
- Meet isolation distances from property lines and buildings based on the size of the storage system.
- Protect storage area from trespassers.
- Keep area free from weeds, combustible materials, and other debris.

Liquid Petroleum Gas (LPG) Tanks

Companies with any of the following are also regulated by the WHMD STU program:

- Any flammable compressed gas or LPG container filling location.
- A company that supplies flammable compressed gas or any LPG that has a tank with a water capacity of more than 2,000 gallons or two or more tanks with an aggregate water capacity of more than 4,000 gallons.

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The LPG systems listed above require an installation application, must pay annual fees, have field inspections, and be certified. Any LPG tank in connection with a building heating system or its equipment is also regulated by the Mechanical Division of the Michigan Department of Labor and Economic Growth (DLEG) under the State Construction Code Act. For more information about these separate requirements, go to the DLEG Web site at www.michigan.gov/dleg.

Basic Requirements for LPG Tank System or Containers

LPG storage is defined as any vessel containing a material having a vapor pressure not exceeding that allowed for commercial propane, which is composed predominately of the following hydrocarbons, either by themselves or as mixtures, and is used to store or transport this mixture:

- Propane
- Propylene
- Butane (normal butane or isobutane)
- Butylene

In addition, LPG tank systems or containers must:

- Meet isolation distances from property lines and buildings based on the size of the storage system.
- Have a protected storage area from trespassers.
- Have an area free from weeds, combustible materials, and other debris.

Transportation of LPG, Similar Hydrocarbons, and Mixtures

The Michigan State Police Traffic Safety Division oversees the transportation of LPG and other similar hydrocarbons in Michigan. To learn more about the transportation regulations, please visit the Michigan State Police Web site at www.michigan.gov/msp. Select “Specialized Divisions,” then “Traffic Safety Division,” and then “Hazardous Materials” from the left-hand menu. Mobile fueling tanks are not regulated by the WHMD if the tank meets the transportation requirements, is insured, and has a current vehicle license (i.e., sticker).

Finally, in association with the transportation requirements for fuel sources, it is also important to contact your local fire authority and the DLEG Michigan Occupational Safety and Health Administration (MIOSHA) program at 517-322-1809 regarding their requirements for flammable and combustible liquids used above ground. Their Web site is www.michigan.gov/miosha.

Where to Go For More Assistance

As you go through this guide and have additional questions or concerns about the application of the regulations to your crushing facility, please feel free to call the DEQ’s Environmental Assistance Program at 800-662-9278.

The DEQ’s Environmental Assistance Program provides:

- **FREE** consultations to business and industry.
- Answers to your questions.
- The resources to help you come into and maintain compliance with the environmental regulations.

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When you call the toll-free telephone number, just tell the operator you need help with one or more of the following environmental topics, and a staff person who specializes in that area will be more than happy to answer your questions.

- Air quality
- Water quality
- Waste management
- Aboveground storage tank management

The EAP also has numerous guidance documents developed to help businesses complete their permits and achieve compliance with the environmental regulations. Access to the EAP's staff and resources can also be obtained by visiting the DEQ's Web page at **www.michigan.gov/deqenvassistance**.